

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

Criminal No.
03-10370-DPW-04

RECEIVED IN OFFICE OF
ROBERT B. COLLINGS
U.S. MAGISTRATE JUDGE
JUN 16 2004
UNITED STATES DISTRICT COURT
BOSTON, MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

DOUGLAS K. BANNERMAN,
DANIEL MACAULEY
AND
JOHN S. GRAHAM, JR.

DEFENDANTS' ASSENTED TO MOTION FOR EXTENSION OF
TIME FOR FILING OF SUBSTANTIVE MOTIONS AND
MOTION TO EXTEND TIME RE:
NOTIFICATION OF CHANGE OF PLEA

Now comes the above captioned defendants, Douglas K. Bannerman, Daniel J. MacAuley and John S. Graham, Jr., in the above numbered indictment and move this Court for permission to further extend the time for filing of substantive motions and notification of change of plea to September 20, 2004.

In support of the within motion the defendants, through counsel, note that this is a matter involving extensive discovery of thousands of pages as represented to the Court. Counsel for the defendants have not had sufficient time to review said discovery and adequately review the evidence and

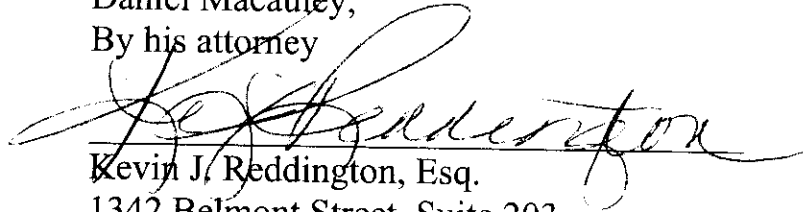
JUN 17 2004 ALLOWED to file 9/22/04

documentation with an eye towards the filing of substantive motions and/or notification of a change of plea on said indictments.

It is for all of these reasons consistent with the Speedy Trial Act and Patriot Act ramifications on sentencing that the defendants file this motion requesting that the date for the filing of substantive motions and/or notification of change of plea be extended up through and including September 20, 2004.

Counsel for the defendants have contacted Assistant United States Attorney Rachel Hershfang and have received her assent to this request.

Daniel Macauley,
By his attorney



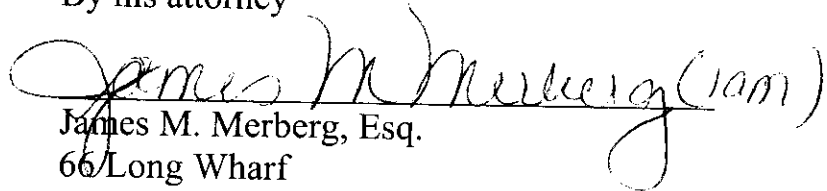
Kevin J. Reddington, Esq.
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(508) 583-4280

John S. Graham, Sr.,
By his attorney

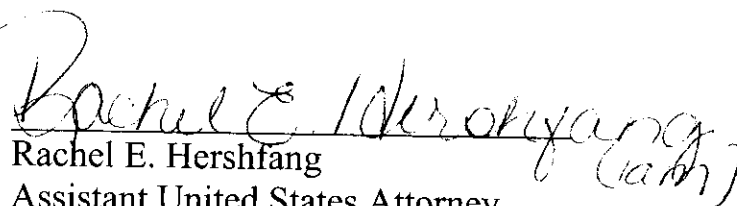


William D. Crowe, Esq.
Crowe & Dunn
141 Tremont Street, 7th Floor
Boston, Massachusetts 02108
(617) 367-6767

Douglas K. Bannerman,
By his attorney


James M. Merberg, Esq.
66 Long Wharf
Boston, Massachusetts 02110
(617) 723-1990

Assented to:


Rachel E. Hershfang
Assistant United States Attorney

CERTIFICATE OF SERVICE

I, Kevin J. Reddington, Esq., Attorney for the Defendant, Daniel Macauley, hereby certify that I have forwarded a copy of the within Defendants' Assented to Motion for Extension of Time for Filing of Substantive Motions and Motion to Extend Time Re: Notification of Change of Plea, this date, via regular mail, to;

Rachel E. Hershfang
Assistant United States Attorney
United States District Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210



Kevin J. Reddington, Esq.

DATED: June 14, 2004